

REMARKS

Applicants' attorney previously elected to prosecute Group I: Claims 1-20, in response to the restriction requirement mailed December 22, 2004. New dependent claims 43-49 have been added. Accordingly, claims 1-20 and 43-49 are pending, of which claim 1 is an independent method claim and claim 17 is a corresponding independent computer program product claim. As indicated above, claims 1-9, 14-16, and 18-20 have been amended by this paper.¹

The Office Action rejected each of the pending independent claims (1 and 16) and some pending dependent claims (2-3, 5, 8-10, 12-15, and 17-20) under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,772,216 to Ankireddipally ("*Ankireddipally*"). Other dependent claims (4, 6, and 7) were rejected under 35 U.S.C. § 103(a) as being unpatentable over *Ankireddipally* in view of U.S. Patent No. 6,457,066 to Mein et al. ("*Mein*"). The remaining dependent claim (11) was rejected under 35 U.S.C. § 103(a) as being unpatentable over *Ankireddipally* and in view of "Microsoft Message Queuing Services (MSMQ) Tips", February 23, 1999.²

Applicants' invention, as claimed for example in amended independent method claim 1, relates to fulfilling a request. The method includes: a first server of the plurality of servers receiving a network request for a service across a transport-independent messaging infrastructure, the network request structured in accordance with a schema accessible to the plurality of servers and the plurality of client devices, the meaning of the network request being implied by the schema; the first server recognizing the meaning of the network request implied by the schema; the first server determining that it has access to some of the information needed in order to respond to the network request based on the recognized meaning of the network request; the first server determining that further information is needed from at least a second server in order to respond to the request for the service based on the recognized meaning of the network request; the first server structuring a further network request for the further information in response to determining that the further information is needed, the further network request

¹Support for the amendments and new dependent claims can be found throughout the Specification, and particularly within paragraphs [0500], [0067] – [0070], [0077], [0143] – [0146], [0151], and within Figures 1, 3, and 6.

²Although the prior art status of the cited art is not being challenged at this time, Applicants reserve the right to challenge the prior art status of any of the cited art in the future. Accordingly, any arguments and amendments made herein should not be construed as acquiescing to any prior art status or asserted teachings of the cited art.

structured in accordance with a second schema; the first server dispatching the further network request to the second server using the transport-independent messaging infrastructure; the first server receiving a network response from the second server across the transport-independent messaging infrastructure, the network response including the further information and the network response being structured in accordance with the second schema; and the first server using the further information to respond to the network request for the service.

Independent claim 16 recites similar limitations from the perspective of a computer program product.

Ankireddipally discloses an interaction protocol for managing cross company processes among network-distributed applications. (Abstract). As depicted in Figure 15, a protocol plug-in 224 contained in a Web server 220 receives a request 300. Plug-in 224 is specifically defined to receive and handle messages in the application interaction protocol format. (Col. 20, lines 35-38). Protocol plug-in 224 parses the request message to produce application-specific data for service application 228 and then invokes service application 228 providing necessary input data via message 320. (Col. 20, line 66 – Col. 21, line 2). Protocol plug-in 224 then receives output update data from service application 228 via message 320. (Col. 21, lines 3-5). As depicted in Figure 15, application 228 is also contained in Web server 220. Then, after formatting the output data into the correct protocol message format, protocol plug-in 224 sends reply message 330 to requesting application 214. (Col. 21, lines 5- 8).

Thus, *Ankireddipally* discloses an interaction protocol for managing processing among network-distributed applications.³ However, *Ankireddipally* does not suggest or disclose a first server determining that it can access some of the information needed in order to respond to a network request without having to contact other servers based on the recognized meaning of the network request and determining that further information is needed from at least a second server in order to respond to the network request based on the recognized meaning of the network

³Based on the assertions in the office action, it appears that protocol plug-in 224 is being referred to as a "first server" and service application (server) 228 is being referred to as a "second server". However, as depicted in Figure 1 of *Ankireddipally*, CX server 10 is a document centric process automation application, exchanging messages in the form of XML interaction documents 40 between CXCs. (Col. 12, lines 33-36). Thus, in Figure 15, messages 300, 310, 340, and 350 are XML interaction documents. However, messages 320 and 330 include application-specific data and are not XML interaction documents. Thus, Applicants submit protocol plug-in 224 and service application (server) 228 are not separate servers but are instead modules contained within Web server 220. Applicants further note that protocol plug-in 224's function is to translate. *Ankireddipally* does not expressly disclose any other function for protocol plug-in 224.

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request. Accordingly, at least for these reasons amended claim 1 overcomes the rejections of record.

In view of the foregoing, all of the pending claims patentable define over the prior art of record. Favorable reconsideration and allowance is respectfully requested.

In the event the Examiner has any additional question that may require clarification, the Examiner is invited to initiate a teleconference with the undersigned attorney of record.

Dated this 5th day of August, 2005.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael B. Dodd".

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